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VIA ECF

Honorable Leda Dunn Wettre, U.S.M.J.
District Court for the District of New Jersey
Martin Luther King Building
50 Walnut Street
Newark, NJ 07102

Re: *City of Newark v. City of New York, et al.*
Case No. 2:19-cv-20931 (MCA) (LDW)

Dear Judge Wettre:

This law firm represents Intervenor Class of Affected Tenants (“Tenants”) in the above-referenced matter. We write pursuant to Your Honor’s request that the parties file concise status letters in advance of the upcoming status conference. (D.E. No. 143.)

The City of Newark (“Newark”) filed a motion seeking to dismiss the claims asserted by “Future Tenants,” represented by Eugene Samuels, who are eligible for City of New York (“NYC”)’s Special One-Time Assistance (“SOTA”), wish to be placed in Newark housing, and are prevented from doing so because of Newark’s ordinance (the “Ordinance”). That motion has been fully briefed and pending as of April 2021.

While the motion has been pending, no discovery has been served on Tenants, and Tenants have served no discovery. To avoid unnecessary duplication, Future Tenants intended to review Newark’s responses to NYC’s discovery requests before determining if supplemental requests are necessary. This Court ordered that Newark (along with NYC and Jersey City) substantially complete all written discovery on or before August 31, 2021. (D.E. No. 143.) We understand that Newark has requested from NYC an indefinite extension of its time to respond and has produced no documents to date.

We thank the Court for its consideration of this matter.

Respectfully submitted,

s/ Rebecca Ryan
Rebecca Ryan